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6 Attorneys for Plaintiffs

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 TRUSTEES OF THE PLUMBERS AND
PIPEFITTERS UNION LOCAL 525
11 HEALTH AND WELFARE TRUST AND
PLAN; TRUSTEES OF THE PLUMBERS
12 AND PIPEFITTERS UNION LOCAL 525
PENSION PLAN; AND THE TRUSTEES
13 OF PLUMBERS AND PIPEFITTERS
LOCAL UNION 525 APPRENTICE AND
14 JOURNEYMAN TRAINING TRUST FOR
SOUTHERN NEVADA,

15 Plaintiffs,

16 vs.

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18 ALL SEASONS INTERIOR & EXTERIOR
MAINTENANCE, dba GREAT BASIN
19 PLUMBING, a Nevada corporation,

20 Defendant.

CASE NO. 2:12-cv-00620-GMN-RJJ

STIPULATED/CONSENT JUDGMENT

22 ALL SEASONS INTERIOR & EXTERIOR MAINTENANCE, dba GREAT BASIN
23 PLUMBING, a Nevada corporation ("All Seasons"), hereby stipulates and consents to entry of
24 judgment in favor of Plaintiffs, Trustees of the Plumbers and Pipefitters Union Local 525 Health
25 and Welfare Trust, the Trustees of the Plumbers and Pipefitters Union Local 525 Pension Plan,
26 and the Trustees of the Plumbers and Pipefitters Local Union 525 Apprentice and Journeyman
27 Training Trust for Southern Nevada (collectively "Trust Funds), and against ALL SEASONS in
28

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1 the total sum of \$416,506 for delinquent employee benefit contributions and related costs and fees
2 owed under the Employee Retirement Income Security Act of 1974 ("ERISA").

3 The parties have stipulated and therefore the Court finds:

4 1. ALL SEASONS is signatory to and bound by the terms of a collective bargaining
5 agreement ("CBA") with the Plumbers and Pipefitters Union Local 525 ("Union"), in which ALL
6 SEASONS agreed to abide by the trust agreements establishing the respective Trust Funds and
7 any amendments thereto ("Trust Agreements").

8 2. Under the CBA and the Trust Agreements, ALL SEASONS is obligated to pay
9 employee benefit contributions to the Trust Funds on behalf of ALL SEASONS's bargaining unit
10 employees represented by the Union.

11 3. Based on a contract compliance review of ALL SEASONS conducted for the
12 period June 1, 2006, through March 31, 2009, and remittance reports prepared and submitted by
13 ALL SEASONS for the period of April 1, 2009, through April 30, 2011, ALL SEASONS owes
14 the Trust Funds Four Hundred Eleven Thousand Five Hundred Six Dollars (\$411,506) in
15 employee benefit contributions, fees, interest and liquidated damages to date.

16 4. In addition, in the event this judgment must be executed, the Trust Funds will incur
17 additional fees and costs determined by the parties to be at least \$5,000, which are therefore
18 included herein.

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5. This Stipulated/Consent Judgment is entered into by and between ALL SEASONS and the Trust Funds for employee benefit contributions and related costs and fees owed to the Trust Funds by ERISA.

June 7th, 2011.

July 7th, 2011.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

ALL SEASONS INTERIOR & EXTERIOR
MAINTENANCE, dba GREAT BASIN
PLUMBING, a Nevada corporation,

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Heard

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For ALL SEASONS INTERIOR & EXTERIOR
MAINTENANCE, dba GREAT BASIN
PLUMBING, a Nevada corporation,

Attorneys for the Trust Funds

JUDGMENT

Judgment is hereby entered against ALL SEASONS INTERIOR & EXTERIOR MAINTENANCE, dba GREAT BASIN PLUMBING, a Nevada corporation, and in favor of the Trust Funds in the amount of \$416,506.

DATED this 4th day of June, 2012.

Gloria M. Navarro

United States District Judge

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STATE OF NEVADA)
COUNTY OF Clark) ss.

Heath E Pyles, being first duly sworn, deposes and says:

That he she is the OWNER of ALL SEASONS INTERIOR & EXTERIOR MAINTENANCE, dba GREAT BASIN PLUMBING, a Nevada corporation, and is duly authorized to execute this document; that he/she has read the foregoing Stipulated/Consent Judgment and knows the contents thereof; that the same is true of his/her own knowledge, except for those matters therein stated on information and belief, and as to those matters he/she believes them to be true.

Heath E Pyles
Affiant

Subscribed and sworn to before me
this 7th day of July, 2011.

[Signature]
- NOTARY PUBLIC -

